



Magistrate Judge Karen L. Strombom

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHANITA D. MCINTOSH,

Defendant.

NO. MJ15-5127

MOTION FOR DETENTION ORDER

The United States moves for pretrial detention of the Defendant, pursuant to
18 U.S.C. § 3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because this
case involves (check all that apply):

☐ Crime of violence (18 U.S.C. § 3156)

☐ Crime of Terrorism (18 U.S.C. § 2332b(g)(5)(B)) with a maximum
sentence of ten years or more

☐ Crime with a maximum sentence of life imprisonment or death

☒ Drug offense with a maximum sentence of ten years or more

☐ Felony offense and defendant has two prior convictions in the four
categories above, or two State convictions that would otherwise fall within
these four categories if federal jurisdiction had existed

☐ Felony offense involving a minor victim other than a crime of violence

1 — Felony offense, other than a crime of violence, involving possession or use
2 of a firearm, destructive device (as those terms are defined in 18 U.S.C.
3 § 921), or any other dangerous weapon

4 — Felony offense other than a crime of violence that involves a failure to
5 register as a Sex Offender (18 U.S.C. § 2250)

6 X Serious risk the defendant will flee

7 — Serious risk of obstruction of justice, including intimidation of a
8 prospective witness or juror

9 — Probable cause to believe the defendant has been found guilty of an offense
10 and is awaiting imposition of a sentence under 18 U.S.C. § 3143(a) and
11 Federal Rule of Criminal Procedure 32.1(a)(6).

12 2. Reason for Detention. The Court should detain defendant because there are
13 no conditions of release which will reasonably assure (check one or both):

14 X Defendant's appearance as required

15 X Safety of any other person and the community

16 3. Rebuttable Presumption. The United States will invoke the rebuttable
17 presumption against defendant under § 3142(e). The presumption applies because:

18 — Probable cause to believe defendant committed offense within five years of
19 release following conviction for a "qualifying offense" committed while on
20 pretrial release

21 X Probable cause to believe defendant committed drug offense with a
22 maximum sentence of ten years or more

23 — Probable cause to believe defendant committed a violation of one of the
24 following offenses: 18 U.S.C. §§ 924(c), 956 (conspiracy to murder or
25 kidnap), 2332b (act of terrorism), 2332b(g)(5)(B) (crime of terrorism)

26 — Probable cause to believe defendant committed an offense involving a
27 victim under the age of 18 under 18 U.S.C. §§ 1591, 2241, 2242,
28 2244(a)(1), 2245, 2251, 2251A, 2252(a)(1) through 2252(a)(3),
2252A(a)(1) through 2252A(a)(4), 2260, 2421, 2422, 2423 or 2425

Probable cause to believe the defendant has been found guilty of an offense and is awaiting imposition of a sentence under 18 U.S.C. § 3143(a) and Federal Rule of Criminal Procedure 32.1(a)(6).

4. Time for Detention Hearing. The United States requests the Court conduct the detention hearing:

At the initial appearance

X After continuance of 3 days

5. Other matters.

DATED this 6th day of August, 2015.

Respectfully submitted,

ANNETTE L. HAYES
United States Attorney

/s/ Amy Jaquette
AMY JAQUETTE
Assistant United States Attorney